

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
Revised April 3, 2017

**For temporary pits, below-grade tanks, and multi-well fluid management pits**, submit to the appropriate NMOC District Office.  
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOC District Office.

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration  
☐ Permit of a pit or proposed alternative method  
**BGT 2** ☒ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request**

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: Hilcorp Energy Company OGRID #: 372171  
Address: 382 Road 3100 Aztec, NM 87410  
Facility or well name: San Juan 28-7 Unit 233E – (Tank #2)  
API Number: 30-039-22619 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr G Section 14 Township 28N Range 7W County: Rio Arriba  
Center of Proposed Design: Latitude 36.663558 Longitude -107.539993 NAD83  
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 120 bbl Type of fluid: Produced Water  
Tank Construction material: Metal  
☐ Secondary containment with leak detection ☒ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☒ Other Unspecified

4.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)  
☐ Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)  
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet  
☐ Alternate. Please specify \_\_\_\_\_

6.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- ☐ Screen ☐ Netting ☐ Other \_\_\_\_\_
- ☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC

- ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

8.

**Variations and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

***Please check a box if one or more of the following is requested, if not leave blank:***

- ☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC***Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*****General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

☐ Yes ☐ No  
☒ NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☒ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

☐ Yes ☐ No

**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

#### **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.

#### **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Climatological Factors Assessment  
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Quality Control/Quality Assurance Construction and Installation Plan  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan  
☐ Emergency Response Plan  
☐ Oil Field Waste Stream Characterization  
☐ Monitoring and Inspection Plan  
☐ Erosion Control Plan  
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Multi-well Fluid Management Pit  
☐ Alternative
- Proposed Closure Method: ☒ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC  
☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  
☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18.

**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

**OCD Representative Signature:** CR Whitehead **Approval Date:** June 9, 2021

**Title:** Environmental Specialist **OCD Permit Number:** BGT 2

19.

**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☒ **Closure Completion Date:** 3/10/2021

20.

**Closure Method:**

- ☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
- ☐ If different from approved plan, please explain.

21.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☒ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☒ Soil Backfilling and Cover Installation
- ☒ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983

22.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Kandis Roland Title: Operations/Regulatory Technician – Sr

Signature: Kandis Roland Date: 3/11/2021

e-mail address: kroland@hilcorp.com Telephone: (505) 324-5149



**Hilcorp Energy Company**  
**San Juan Basin: New Mexico Assets**  
Below Grade Tank Closure Report

**Lease Name:** San Juan 28-7 Unit 233E  
**API No.:** 30-039-22619

In accordance with Rule 19.15.17.13 NMAC, the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

**General Plan Requirements:**

1. Prior to initiating any BGT closure, except in the case of an emergency, HILCORP will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hours or one week before closure and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner will be notified as soon as practical.

**The surface owner was notified by email of the closure process and the notification is attached.**

2. Notice of closure will be given to the District Division office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name
  - b. Well Name and API Number
  - c. Location

**Notification is attached.**

3. All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed of at one of HILCORP's approved Salt Water Disposal facilities or at a District Division approved facility.

**All recovered liquids were disposed of at an approved SWD facility or an approved District Division facility within 60 days of cessation of operation.**

4. Solids and sludge's will be shoveled and/or vacuumed out for disposal at one of the District Division approved facilities, depending on the proximity of the BGT site: Envirotech Land Farm (Permit #NM-01-011), JFJ Land Farm % Industrial Ecosystems Inc. (Permit #NM-01-0010B), and Basin Disposal (Permit #NM-01-005).

**Any sludge or soil required to be removed to facilitate closure was transported to Envirotech Land Farm (Permit # NM-01-011) and/or JFJ Landfarm % IEI (Permit# NM-01-0010B).**

Revised 10/14/2015

5. HILCORP will obtain prior approval from District Division to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the District Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of 19.15.35 NMAC. Disposal will be at a licensed disposal facility, presently San Juan County Landfill operated by Waste Management under NMED Permit SWM-052426.

**The below-grade tank was disposed of in a division-approved manner. The liner was cleaned per 19.15.35.8.C(1)(m) NMAC and disposed of at the San Juan County Regional Landfill located on CR 3100.**

6. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure, will be removed.

**All on-site equipment associated with the below-grade tank was removed.**

7. Following removal of the tank and any liner material, HILCORP will test the soils beneath the BGT as follows:
  - a. At a minimum, a five-point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.
  - b. The laboratory sample shall be analyzed for the constituents listed in Table I of 19.15.17.13.

**A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Table I of 19.15.17.13 and the results are attached.**

8. If the District Division and/or HILCORP determine there is a release, HILCORP will comply with 19.15.17.13.C.3b.

**A release was not determined for the above referenced well.**

9. Upon completion of the tank removal, pursuant to 19.15.17.13.C.3c, if all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot top soil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and to prevent ponding.

**The tank removal area passed all requirements of Table I of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material which included at least one foot of suitable material to establish vegetation at the site.**

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10. For those portions of the former BGT area no longer required for production activities, HILCORP will seed the disturbed area the first favorable growing season after the BGT is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other District Division-approved methods. HILCORP will notify the District Division when reclamation and re-vegetation is complete.

Reclamation of the BGT shall be considered complete when:

- Vegetative cover reflects a life form ratio of +/- 50% of pre disturbance levels.
- Total percent plant cover of at least 70% of pre-disturbance levels (Excluding noxious weeds) OR
- Pursuant to 19.15.17.13.H.5d HILCORP will comply with obligations imposed by other applicable federal or tribal agencies in which there re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment.

**Provision 10 will be accomplished pursuant to 19.15.17.H.5d and notification will be submitted upon completion.**

11. For those portions of the former BGT area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

**The former BGT area is required for production activities and reseeding will be completed upon plug and abandonment, per the procedure noted above.**

**Closure Report:**

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using District Division Form C-144. The Report will include the following:

- Proof of Closure Notice (surface owner and District Division) **(Attached)**
- Backfilling & cover installation **(See Report)**
- Confirmation Sampling Analytical Results **(Attached)**
- Application Rate & Seeding techniques **(See Report)**
- Photo Documentation of Reclamation **(Attached)**

Revised 10/14/2015

Kandis Roland

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From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>  
Sent: Monday, February 8, 2021 7:16 AM  
To: Kurt Hoekstra; Kandis Roland; 'rjoyner@blm.gov'; Kelly, Jonathan, EMNRD  
Cc: Cheryl Weston; Ryan Frost; Clara Cardoza; Mark McKnight; Trey Sullivan  
Subject: RE: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 233E (30-039-22619) - 72 Hour BGT Closure Notification

Kurt,

Works for me! Thanks for the update

**Cory Smith** • Environmental Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
1000 Rio Brazos | Aztec, NM 87410  
505.334.6178 x115 | [Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

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From: Kurt Hoekstra <khoekstra@hilcorp.com>  
Sent: Monday, February 8, 2021 6:29 AM  
To: Kandis Roland <kroland@hilcorp.com>; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; 'rjoyner@blm.gov' <rjoyner@blm.gov>; Kelly, Jonathan, EMNRD <Jonathan.Kelly@state.nm.us>  
Cc: Cheryl Weston <cweston@hilcorp.com>; Ryan Frost <rfrost@hilcorp.com>; Clara Cardoza <ccardoza@hilcorp.com>; Mark McKnight <mmcknight@hilcorp.com>; Trey Sullivan <tsullivan@hilcorp.com>  
Subject: [EXT] RE: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 233E (30-039-22619) - 72 Hour BGT Closure Notification

Hello All, I would like to reschedule this to Tuesday afternoon 2-9-2021 at 1:00 pm if this is ok with the OCD and BLM. Late Friday afternoon I was notified by the NM Dept. of Health that I was eligible for the Covid vaccine and the only available time is Wednesday morning. Please let me know if this re-schedule time and date is acceptable.

Thank you.

---

From: Kandis Roland  
Sent: Friday, February 5, 2021 10:59 AM  
To: Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; 'rjoyner@blm.gov' <[rjoyner@blm.gov](mailto:rjoyner@blm.gov)>; 'Kelly, Jonathan, EMNRD' <[Jonathan.Kelly@state.nm.us](mailto:Jonathan.Kelly@state.nm.us)>  
Cc: Kandis Roland <[kroland@hilcorp.com](mailto:kroland@hilcorp.com)>; Cheryl Weston <[cweston@hilcorp.com](mailto:cweston@hilcorp.com)>; Ryan Frost <[rfrost@hilcorp.com](mailto:rfrost@hilcorp.com)>; Clara Cardoza <[ccardoza@hilcorp.com](mailto:ccardoza@hilcorp.com)>; Kurt Hoekstra <[khoekstra@hilcorp.com](mailto:khoekstra@hilcorp.com)>; Mark McKnight <[mmcknight@hilcorp.com](mailto:mmcknight@hilcorp.com)>; Trey Sullivan <[tsullivan@hilcorp.com](mailto:tsullivan@hilcorp.com)>  
Subject: FW: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 233E (30-039-22619) - 72 Hour BGT Closure Notification

Subject: 72 Hour BGT Closure Notification

Anticipated Start Date: Wednesday, February 10, 2021 at approximately 9:00 AM.

The subject well had a below-grade tank that was never closed out properly by ConocoPhillips. The BGT permit is attached. Will collect a 5pt composite sample at 8' as requested by OCD. Please contact me at any time if you have any questions or concerns.

**Well Name:** San Juan 28-7 Unit 233E  
**API#:** 30-039-22619  
**Location:** Unit G Section 14, T28N, R07W  
**Footages:** 1710' FNL & 1780' FEL  
**Operator:** Hilcorp Energy **Surface Owner:** BLM  
**Reason:** INC cJK2031023516 – C-144 closure was never filed by ConocoPhillips.

**Please forward to anyone that I may have missed.**

Thank you,

Kandis Roland  
HILCORP ENERGY  
San Juan South Regulatory  
505.324.5149  
[kroland@hilcorp.com](mailto:kroland@hilcorp.com)

---

From: Smith, Cory, EMNRD [<mailto:Cory.Smith@state.nm.us>]  
Sent: Thursday, February 4, 2021 1:54 PM  
To: Kandis Roland <[kroland@hilcorp.com](mailto:kroland@hilcorp.com)>; Kelly, Jonathan, EMNRD <[Jonathan.Kelly@state.nm.us](mailto:Jonathan.Kelly@state.nm.us)>  
Subject: [EXTERNAL] RE: SAN JUAN 28-7 UNIT 233E - INC

Kandis,

Looking for the inspections it looks like there is still a depression on location and the site hasn't been leveled yet.

It would be best to go ahead and send out the notice again collect a 5pt composite sample at 8' and make sure that the location meets all the closure requirements so it can be closed properly.

**Cory Smith • Environmental Specialist**  
Environmental Bureau  
EMNRD - Oil Conservation Division  
1000 Rio Brazos | Aztec, NM 87410  
505.334.6178 x115 | [Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

---

From: Kandis Roland <[kroland@hilcorp.com](mailto:kroland@hilcorp.com)>  
Sent: Thursday, February 4, 2021 1:26 PM  
To: Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; Kelly, Jonathan, EMNRD <[Jonathan.Kelly@state.nm.us](mailto:Jonathan.Kelly@state.nm.us)>  
Subject: [EXT] FW: SAN JUAN 28-7 UNIT 233E - INC

Cory,

COP closed out this BGT and took samples but never filed a C-144 Closure report. I also was unable to find where a 72 hour notice was sent by COP. Attached is the sample report. I was also able to locate a C-144 BGT permit, see attached. Below is an area view.





Thanks,

Kandis Roland  
HILCORP ENERGY  
San Juan South Regulatory  
505.324.5149  
[kroland@hilcorp.com](mailto:kroland@hilcorp.com)

From: Clara Cardoza  
 Sent: Thursday, November 5, 2020 8:56 AM  
 To: Kandis Roland <[kroland@hilcorp.com](mailto:kroland@hilcorp.com)>; Ryan Frost <[rfrost@hilcorp.com](mailto:rfrost@hilcorp.com)>; Trey Sullivan <[tsullivan@hilcorp.com](mailto:tsullivan@hilcorp.com)>  
 Cc: Cheryl Weston <[cweston@hilcorp.com](mailto:cweston@hilcorp.com)>  
 Subject: RE: SAN JUAN 28-7 UNIT 233E - INC

Here is a closure report from 2014. Let me know if you have any questions or require additional information.

Thank you,  
 Clara

From: Kandis Roland  
 Sent: Thursday, November 5, 2020 7:55 AM  
 To: Mark McKnight <[mmcknight@hilcorp.com](mailto:mmcknight@hilcorp.com)>; Ryan Frost <[rfrost@hilcorp.com](mailto:rfrost@hilcorp.com)>; Trey Sullivan <[tsullivan@hilcorp.com](mailto:tsullivan@hilcorp.com)>; Clara Cardoza <[ccardoza@hilcorp.com](mailto:ccardoza@hilcorp.com)>  
 Cc: Kandis Roland <[kroland@hilcorp.com](mailto:kroland@hilcorp.com)>; Cheryl Weston <[cweston@hilcorp.com](mailto:cweston@hilcorp.com)>  
 Subject: SAN JUAN 28-7 UNIT 233E - INC

<b>Today's Date:</b>	11/5/2020				
<b>Well Name:</b>	SAN JUAN 28-7 UNIT 233E	<b>Location:</b>	Sec: 14	Twn: 028N	Rng: C
<b>API Number:</b>	30.039.22619	<b>Footage:</b>	1710' FNL & 1780' FEL		
<b>Operator:</b>	Hilcorp Energy Company	<b>Area/Run/MSO:</b>	10	1007	Greg V
<b>Meter #:</b>	93-903-01	<b>Pipeline:</b>	ENT		
<b>INC Number:</b>	cJK2031023516	<b>Agency:</b>	OCD	<b>Inspector:</b>	Jonatha
<b>Type of INC:</b>	Verbal	<b>Photos Required:</b>	Yes	<b>Due Date:</b>	
<b>Issue of Concern:</b>	Below grade tank #2 has been closed, no C-144 Below grade tank Closure Permit in well file, depression at coordinates listed on below grade tank #2's registration, needs to be properly leveled and reclaimed and Report submitted to comply with 19.15.17 NMAC.				

Kandis Roland  
 HILCORP ENERGY  
 San Juan South Regulatory  
 505.324.5149  
[kroland@hilcorp.com](mailto:kroland@hilcorp.com)

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**Kandis Roland**

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**From:** Clara Cardoza  
**Sent:** Friday, February 12, 2021 9:08 AM  
**To:** Kandis Roland  
**Subject:** FW: [EXTERNAL] RE: San Juan 28-7 Unit 233E  
**Attachments:** GPS Coordinates (2).jpg; Hand Augured to 2.5 ' deep.jpg; Sign.jpg; Small Depression Area.jpg

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**From:** Smith, Cory, EMNRD [mailto:Cory.Smith@state.nm.us]  
**Sent:** Friday, February 12, 2021 8:44 AM  
**To:** Kurt Hoekstra <khoekstra@hilcorp.com>; Clara Cardoza <ccardoza@hilcorp.com>  
**Subject:** [EXTERNAL] RE: San Juan 28-7 Unit 233E

Kurt,

After reviewing the aerials OCD inspection documents/photos, I believe you were in the correct area for the previous BGT Location.

Please submit the sample to the laboratory and process the closure report. HEC needs to ensure that the area is level, and the backfill meets the requirements i.e. grade and ponding so there is some additional work that needs to be done.

Please include this email in your C-144 Closure report.

Thanks,

**Cory Smith** • Environmental Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
1000 Rio Brazos | Aztec, NM 87410  
505.334.6178 x115 | [Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

---

**From:** Kurt Hoekstra <[khoekstra@hilcorp.com](mailto:khoekstra@hilcorp.com)>  
**Sent:** Friday, February 12, 2021 8:18 AM  
**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>; Clara Cardoza <[ccardoza@hilcorp.com](mailto:ccardoza@hilcorp.com)>  
**Subject:** [EXT] San Juan 28-7 Unit 233E

Hello Cory, Per our conversation on 2-9-2021, I attempted to collect a BGT closure sample at the SJ 28-7 # 233E. I hand augured to approximately 2-1/2 ' deep at all five composite locations and had auger refusal. I believe I encountered sandstone at that depth. I collected a composite sample at 2-1/2 ' below surface in hope of using that sample to close this historic BGT site from 2014. I am attaching photos for your review.

Thank you.

Kurt Hoekstra  
Field Environmental Specialist  
505-486-9543  
[khoekstra@hilcorp.com](mailto:khoekstra@hilcorp.com)

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District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural  
Resources Department

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party	Hilcorp Energy Company	OGRID	372171
Contact Name	Kandis Roland	Contact Telephone	(505) 324-5149
Contact email	kroland@hilcorp.com	Incident #	(assigned by OCD)
Contact mailing address	382 Road 3100 Aztec NM 87410		

### Location of Release Source

Latitude 36.663558 Longitude -107.539993  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	San Juan 28-7 Unit 233E (Tank #2)	Site Type	Gas Well
Date Release Discovered	N/A	API# (if applicable)	30-039-22619

Unit Letter	Section	Township	Range	County
G	14	28N	7W	Rio Arriba

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

No release was encountered during the BGT Closure.

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?  N/A
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?  Not Required	

### Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:     
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.  Printed Name: <u>Kandis Roland</u> Title: <u>Operations/Regulatory Technician – Sr.</u>  Signature: <u>Kandis Roland</u> Date: <u>3/11/21</u>  email: <u>kroland@hilcorp.com</u> Telephone: <u>(505) 324-5149</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____



## ANALYTICAL REPORT

February 22, 2021

**HilCorp-Farmington, NM**

Sample Delivery Group: L1317129  
Samples Received: 02/13/2021  
Project Number:  
Description: San Juan 28-7 Unit 233E  
Site: SAN JUAN 28-7UNIT 233E  
Report To: Clara Cardoza  
382 Road 3100  
Aztec, NM 87410

<sup>1</sup> Cp<sup>2</sup> Tc<sup>3</sup> Ss<sup>4</sup> Cn<sup>5</sup> Sr<sup>6</sup> Qc<sup>7</sup> Gl<sup>8</sup> Al<sup>9</sup> Sc

Entire Report Reviewed By:

Olivia Studebaker  
Project Manager

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by Pace Analytical National is performed per guidance provided in laboratory standard operating procedures ENV-SOP-MTJL-0067 and ENV-SOP-MTJL-0068. Where sampling conducted by the customer, results relate to the accuracy of the information provided, and as the samples are received.

**Pace Analytical National**12065 Lebanon Rd Mount Juliet, TN 37122 615-758-5858 800-767-5859 [www.pacenational.com](http://www.pacenational.com)

Cp: Cover Page	1	<sup>1</sup> Cp
Tc: Table of Contents	2	
Ss: Sample Summary	3	<sup>2</sup> Tc
Cn: Case Narrative	4	
Sr: Sample Results	5	<sup>3</sup> Ss
BGT L1317129-01	5	<sup>4</sup> Cn
Qc: Quality Control Summary	6	<sup>5</sup> Sr
Wet Chemistry by Method 300.0	6	
Volatile Organic Compounds (GC) by Method 8015/8021	7	<sup>6</sup> Qc
Semi-Volatile Organic Compounds (GC) by Method 8015	9	
Gl: Glossary of Terms	10	<sup>7</sup> Gl
Al: Accreditations & Locations	11	<sup>8</sup> Al
Sc: Sample Chain of Custody	12	<sup>9</sup> Sc



BGT L1317129-01 Solid

Collected by  
K Hoekstra

Collected date/time  
02/09/21 14:30

Received date/time  
02/13/21 11:30

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Wet Chemistry by Method 300.0	WG1622606	1	02/21/21 11:16	02/21/21 18:40	LBR	Mt. Juliet, TN
Volatile Organic Compounds (GC) by Method 8015/8021	WG1622076	1	02/14/21 10:51	02/18/21 17:56	DWR	Mt. Juliet, TN
Semi-Volatile Organic Compounds (GC) by Method 8015	WG1622188	1	02/19/21 10:28	02/19/21 21:13	DMG	Mt. Juliet, TN

<sup>1</sup>Cp

<sup>2</sup>Tc

<sup>3</sup>Ss

<sup>4</sup>Cn

<sup>5</sup>Sr

<sup>6</sup>Qc

<sup>7</sup>Gl

<sup>8</sup>Al

<sup>9</sup>Sc

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.



Olivia Studebaker  
Project Manager

- <sup>1</sup> Cp
- <sup>2</sup> Tc
- <sup>3</sup> Ss
- <sup>4</sup> Cn
- <sup>5</sup> Sr
- <sup>6</sup> Qc
- <sup>7</sup> Gl
- <sup>8</sup> Al
- <sup>9</sup> Sc

Collected date/time: 02/09/21 14:30

L1317129

## Wet Chemistry by Method 300.0

Analyte	Result mg/kg	Qualifier	RDL mg/kg	Dilution	Analysis date / time	Batch
Chloride	ND		20.0	1	02/21/2021 18:40	<a href="#">WG1622606</a>

## Volatile Organic Compounds (GC) by Method 8015/8021

Analyte	Result mg/kg	Qualifier	RDL mg/kg	Dilution	Analysis date / time	Batch
Benzene	ND	<a href="#">J3</a>	0.000500	1	02/18/2021 17:56	<a href="#">WG1622076</a>
Toluene	ND	<a href="#">J3</a>	0.00500	1	02/18/2021 17:56	<a href="#">WG1622076</a>
Ethylbenzene	ND	<a href="#">J3</a>	0.000500	1	02/18/2021 17:56	<a href="#">WG1622076</a>
Total Xylene	ND	<a href="#">J3</a>	0.00150	1	02/18/2021 17:56	<a href="#">WG1622076</a>
TPH (GC/FID) Low Fraction	ND		0.100	1	02/18/2021 17:56	<a href="#">WG1622076</a>
(S) a,a,a-Trifluorotoluene(FID)	113		77.0-120		02/18/2021 17:56	<a href="#">WG1622076</a>
(S) a,a,a-Trifluorotoluene(PID)	105		72.0-128		02/18/2021 17:56	<a href="#">WG1622076</a>

## Semi-Volatile Organic Compounds (GC) by Method 8015

Analyte	Result mg/kg	Qualifier	RDL mg/kg	Dilution	Analysis date / time	Batch
C10-C28 Diesel Range	ND		4.00	1	02/19/2021 21:13	<a href="#">WG1622188</a>
C28-C40 Oil Range	4.52		4.00	1	02/19/2021 21:13	<a href="#">WG1622188</a>
(S) o-Terphenyl	55.9		18.0-148		02/19/2021 21:13	<a href="#">WG1622188</a>

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc

Wet Chemistry by Method 300.0

L1317129-01

Method Blank (MB)

(MB) R3623886-1 02/21/21 13:11

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Chloride	U		9.20	20.0

L1316767-01 Original Sample (OS) • Duplicate (DUP)

(OS) L1316767-01 02/21/21 14:09 • (DUP) R3623886-3 02/21/21 14:26

Analyte	Original Result mg/kg	DUP Result mg/kg	Dilution	DUP RPD %	DUP RPD Limits %
Chloride	ND	ND	1	0.000	20

L1317504-02 Original Sample (OS) • Duplicate (DUP)

(OS) L1317504-02 02/21/21 19:14 • (DUP) R3623886-6 02/21/21 19:31

Analyte	Original Result mg/kg	DUP Result mg/kg	Dilution	DUP RPD %	DUP RPD Limits %
Chloride	67.7	77.3	1	13.2	20

Laboratory Control Sample (LCS)

(LCS) R3623886-2 02/21/21 13:44

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Chloride	200	195	97.3	90.0-110	

L1316794-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1316794-01 02/21/21 16:58 • (MS) R3623886-4 02/21/21 17:15 • (MSD) R3623886-5 02/21/21 17:32

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Chloride	500	ND	499	501	99.8	100	1	80.0-120			0.282	20

<sup>1</sup> Cp

<sup>2</sup> Tc

<sup>3</sup> Ss

<sup>4</sup> Cn

<sup>5</sup> Sr

<sup>6</sup> Qc

<sup>7</sup> Gl

<sup>8</sup> Al

<sup>9</sup> Sc

Volatile Organic Compounds (GC) by Method 8015/8021

[L1317129-01](#)

## Method Blank (MB)

(MB) R3623129-3 02/18/21 14:39

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Benzene	U		0.000120	0.000500
Toluene	U		0.000150	0.00500
Ethylbenzene	U		0.000110	0.000500
Total Xylene	U		0.000460	0.00150
TPH (GC/FID) Low Fraction	0.0247	↓	0.0217	0.100
(S) a,a,a-Trifluorotoluene(PID)	109			72.0-128
(S) a,a,a-Trifluorotoluene(FID)	118			77.0-120

## Laboratory Control Sample (LCS)

(LCS) R3623129-1 02/18/21 10:47

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
TPH (GC/FID) Low Fraction	5.50	4.95	90.0	72.0-127	
(S) a,a,a-Trifluorotoluene(PID)			115	72.0-128	
(S) a,a,a-Trifluorotoluene(FID)			106	77.0-120	

## Laboratory Control Sample (LCS)

(LCS) R3623129-2 02/18/21 13:33

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Benzene	0.0500	0.0596	119	76.0-121	
Toluene	0.0500	0.0566	113	80.0-120	
Ethylbenzene	0.0500	0.0563	113	80.0-124	
Total Xylene	0.150	0.176	117	37.0-160	
(S) a,a,a-Trifluorotoluene(PID)			108	72.0-128	
(S) a,a,a-Trifluorotoluene(FID)			116	77.0-120	

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc

Volatile Organic Compounds (GC) by Method 8015/8021

L1317129-01

L1317129-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1317129-01 02/18/21 17:56 • (MS) R3623129-4 02/18/21 21:59 • (MSD) R3623129-5 02/18/21 22:21

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Benzene	0.0500	ND	0.0235	0.0140	46.2	27.2	1	10.0-155		J3	50.7	32
Toluene	0.0500	ND	0.0231	0.0124	45.4	24.0	1	10.0-160		J3	60.3	34
Ethylbenzene	0.0500	ND	0.0227	0.0112	45.4	22.4	1	10.0-160		J3	67.8	32
Total Xylene	0.150	ND	0.0660	0.0318	44.0	21.2	1	10.0-160		J3	69.9	32
(S) a,a,a-Trifluorotoluene(FID)					110	112		77.0-120				
(S) a,a,a-Trifluorotoluene(PID)					103	103		72.0-128				

L1317145-07 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1317145-07 02/18/21 21:37 • (MS) R3623129-6 02/18/21 22:43 • (MSD) R3623129-7 02/18/21 23:05

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
TPH (GC/FID) Low Fraction	97.9	17.1	101	91.6	85.7	76.1	25	10.0-151			9.76	28
(S) a,a,a-Trifluorotoluene(FID)					108	108		77.0-120				
(S) a,a,a-Trifluorotoluene(PID)					111	112		72.0-128				

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc



Semi-Volatile Organic Compounds (GC) by Method 8015 [L1317129-01](#)

Method Blank (MB)

(MB) R3623329-1 02/19/21 20:33

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
C10-C28 Diesel Range	U		1.61	4.00
C28-C40 Oil Range	U		0.274	4.00
(S) o-Terphenyl	60.2			18.0-148

Laboratory Control Sample (LCS)

(LCS) R3623329-2 02/19/21 20:46

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
C10-C28 Diesel Range	50.0	37.1	74.2	50.0-150	
(S) o-Terphenyl			86.8	18.0-148	

L1317170-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1317170-01 02/20/21 00:20 • (MS) R3623329-3 02/20/21 00:34 • (MSD) R3623329-4 02/20/21 00:47

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
C10-C28 Diesel Range	49.7	14.0	21.6	21.4	15.3	14.9	1	50.0-150	J6	J6	0.930	20
(S) o-Terphenyl					42.3	46.8		18.0-148				

1Cp

2Tc

3Ss

4Cn

5Sr

6Qc

7Gl

8Al

9Sc

## Guide to Reading and Understanding Your Laboratory Report

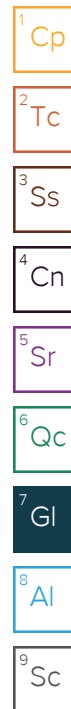
The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

### Abbreviations and Definitions

MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state "ND" (Not Detected) or "BDL" (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description
J	The identification of the analyte is acceptable; the reported value is an estimate.
J3	The associated batch QC was outside the established quality control range for precision.
J6	The sample matrix interfered with the ability to make any accurate determination; spike value is low.



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\* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

\* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace National.

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California	2932	New Mexico <sup>1</sup>	TN00003
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina <sup>1</sup>	DW21704
Georgia	NELAP	North Carolina <sup>3</sup>	41
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Kentucky <sup>2</sup>	16	South Dakota	n/a
Louisiana	AI30792	Tennessee <sup>1 4</sup>	2006
Louisiana	LA018	Texas	T104704245-20-18
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Maryland	324	Utah	TN000032021-11
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Michigan	9958	Virginia	110033
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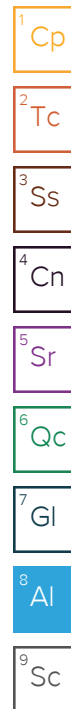
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Texas	T104704328-20-18
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<sup>1</sup> Drinking Water <sup>2</sup> Underground Storage Tanks <sup>3</sup> Aquatic Toxicity <sup>4</sup> Chemical/Microbiological <sup>5</sup> Mold <sup>6</sup> Wastewater n/a Accreditation not applicable





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San Juan 28-7 Unit 233E

30-039-22619



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**District IV**  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
  
Action 20567

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 20567
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	6/9/2021